

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

W.K., E.H., M.M., R.P., M.B., D.P.,
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI
NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and
RRI III, LLC,

Defendants.

PL Sum. J.

Ex. 069

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF W.K.'S OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff W.K. (“W.K.” or “Plaintiff”) hereby provides objections and responses to Defendant Red Roof Inns, Inc.’s First Interrogatories (the “Interrogatories”). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court’s June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

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hotel on or about December 6, 2014 (see below). Police were notified after this drowning incident.

Aldonte sold W.K. at a rate of about \$200 per hour while at this hotel. He also kept all the money W.K. collected for these encounters. While at this hotel, Aldonte had other victims including one named Juicy, whom he also choked while at a different hotel.

W.K. did not check in at this hotel (or any of the hotels) on her own because she was a minor at this time. She believes Aldonte may have checked in using a fake ID or had someone else check in for him because he had a known criminal record.

Aldonte would advertise W.K. for sex on websites such as Backpage and Craigslist. He may also have had W.K. post these advertisements on her own, at his direction.

Each of her stays at this hotel lasted usually between 2 and 3 days at a time. When she was trafficked at this hotel, there were two other minor victims of sex trafficking, each younger than she was (about 13 or 14 years old) (Juicy and [REDACTED] W.K. and these minor victims were forced to have sex with numerous men each day. In fact, W.K. recalls that on some

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occasions, the minor children were forced to have sex together with the same man at the same time.

W.K. recalls that these staff members would occasionally buy marijuana from the sex traffickers who frequented this hotel. W.K. believes that hotel staff knew these men as drug dealers and sex traffickers based on how friendly they were to each other and how they seemed to all know each other well.

On any day, there could be up to 800 buyers coming and going from this hotel. This volume was just one clear sign that sex trafficking was occurring at this hotel. In addition to this volume of men coming in and out of the hotel on an hourly basis, the trash cans in the hotel room would fill with used condoms. She and other victims would make excessive requests for extra linens.

Aldonte also trafficked W.K. out of the Atlanta RRI, likely in the fall of 2014. It was still warm outside when her trafficking at this hotel began. Juicy and [REDACTED] were also victims at this hotel. W.K. believes that Juicy and [REDACTED] were both about 13 or 14 years old at this time and looked obviously underage.

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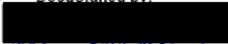
VERIFICATION

The answers set forth in **PLAINTIFF W.K.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This 20th day of August, 2021.

DocuSigned by:

W.K.
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